

**MMC ASSOCIATES**  
**CONSULTING ENGINEERS, BUILDING SERVICES**  
**614 SAN MATEO AVENUE, SUITE 3**  
**SAN BRUNO, CA 94066**  
**TEL: (650) 589-9511 FAX: (650) 952-5806**  
**E-MAIL: MMCA1@MSN.COM**

June 5, 2003

Bill Pennington  
California Energy Commission  
1516 9<sup>th</sup> Street, MS 25  
Sacramento, CA 95814

Re: Title 24 Documents (2005) Occupancy "T"

Dear Mr. Pennington,

Please note that a few Design Engineering Firms in the San Francisco Bay Area are retained by Healthcare Management Organizations for their Design Engineering expertise in the field of Heating, Ventilating, Air Conditioning, Plumbing, Medical Gases, Fire Protection, Fire Alarms, Electrical Lighting and Power Systems.

You may be aware of the fact that more and more companies are asking new employees to contribute towards payment of healthcare insurance premiums, because they can not afford to make full payments due to rising costs.

During our investigation, we have found that a recent survey of procedures and benefits conducted by a company in Massachusetts has shown, more design firms are requiring their employees to contribute towards insurance premiums than ever before, 55% to be exact, nearly double the percentage five years ago.

We have noted that in the T24 (2005) draft, Subchapter 1, titled All occupancies-General Provisions, Occupancy Group I, is not being included, also that it has never been included in the past.

A few companies also provide Design Engineering Services for Healthcare Facilities Overseas, where Design is based on the standards that we follow for the facilities built in the USA.

Your attention is also drawn to the fact that more and more Nursing Homes in the State of California are being shut down for lack of compliance with the Codes of Practices.....Ref: California Advocate for Nursing Home Reform.....

Our observations have been, that this may be due to the maintenance Staff's inability to understand complex controls that are being designed by the Engineers and specified to be installed by the installing Contractors. However it is important to note, that Healthcare costs have also increased due to lack of energy conscious design strategies, in our opinion that should be required by OSHPD.

T24 (2005)

Above comments on Nursing Homes are being made to you as a result of concerns mentioned by members of the Design Profession that are due to retire and some that will be retiring in the next five to ten years.

By including Occupancy "I" in the 2005 T24 Documents, we would be helping the Healthcare Industry to save costs and in turn cut down on the rising costs of premiums. It is my belief, that the Office of Statewide Health Planning and Development (OSHDP) and Department of the State Architect (DSA) were formed to ensure hospitals and Nursing Homes are built to meet appropriate Codes of Practices.

At this time I will not attempt to mention design non compliance that takes place during the construction phase, commissioning phase and the occupancy acceptance documentation that gets prepared by the installing contractors. Please let me know, if and when there is an occasion, when I may be able to address your panel of experts on this very important subject. I feel that while we have an opportunity, we should add occupancy "I" to the new standards.

I am looking forward to hearing from you.

Sincerely,  
MMC ASSOCIATES

A handwritten signature in black ink, appearing to read "M Chikhale", with a horizontal line underneath.

Matt M. Chikhale, P.E.

Copy to Kurt Schaefer, Deputy Director OSHPD  
Facilities Development Division  
1600 Ninth Street, Room 20  
Sacramento, CA 95814